

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

RAMIRO FELIX GONZALES, §
Plaintiff, §
v. § CIVIL ACTION NO. 4:21-CV-00828
§
BRYAN COLLIER, Executive Director §
of the Texas Department of Criminal §
Justice, BOBBY LUMPKIN, Director §
of the Texas Department of Criminal §
Justice–Correctional Institutions §
Division, and DENNIS CROWLEY, §
Warden of the Huntsville Unit, §
Defendants. §

DEFENDANTS' MOTION TO SEAL ADDITIONAL TRIAL EXHIBITS

Defendants Bryan Collier, Bobby Lumpkin, and Dennis Crowley (collectively, “Defendants”), by and through the Office of the Attorney General of Texas, respectfully move to file under seal additional items to their trial exhibit list. ECF No. 82.

These exhibits and photos include information that implicates the security of the execution process because it is not information available to the public and could be used to circumvent security measures if it was filed publicly. Sealing these documents would be consistent with the court’s previous orders granting motions to seal documents in this case based on security implications.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER

First Assistant Attorney General

GRANT DORFMAN

Deputy First Assistant Attorney General

SHAWN E. COWLES

Deputy Attorney General for Civil Litigation

SHANNA E. MOLINARE

Division Chief

Law Enforcement Defense Division

/s/ Leah O'Leary

LEAH O'LEARY

Assistant Attorney General

Attorney-in-Charge

State Bar No. 24079074

Southern District No. 1563191

Leah.Oleary@oag.texas.gov

Law Enforcement Defense Division
OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548
Austin, Texas 78711-2548
(512) 463-2080 / Fax (512) 370-9918

**ATTORNEYS FOR DEFENDANTS
COLLIER, LUMPKIN, AND CROWLEY**

CERTIFICATE OF CONFERENCE

I, Leah O'Leary, certify that on July 1, 2022, I filed these under seal pursuant to the court's order of the same date. As it is a court order, it is presumed Plaintiff is unopposed to this motion.

/s/ Leah O'Leary

Leah O'Leary

Assistant Attorney General

CERTIFICATE OF SERVICE AND ELECTRONIC FILING

I, Leah O'Leary, certify that on July 1, 2022, I electronically filed the foregoing document with the Clerk of the Court for the United States Court for the Southern District

of Texas using the electronic case-filing (ECF) system of the Court, which electronically serves all counsel of record and registered users in this case.

/s/ Leah O'Leary
Leah O'Leary
Assistant Attorney General